

FILED
Clerk
District Court

JUN 12 2006

For The Northern Mariana Islands
By _____
(Deputy Clerk)

1 KRISTIN D. ST. PETER
Assistant Attorney General
2 Commonwealth of the Northern Mariana Islands
Office of the Attorney General-Civil Division
3 2nd Floor, Hon. Juan A. Sablan Memorial Bldg.
Caller Box 10007
4 Saipan, MP 96950

5 Attorney for: Defendants CNMI, Forelli, Bush, Cotton and Brown

6 IN THE UNITED STATES DISTRICT COURT
7 DISTRICT OF THE NORTHERN MARIANA ISLANDS

8 ROBERT D. BRADSHAW,

Case No. 05-0027

9 Plaintiff,

10 vs.

**EX PARTE MOTION EXTENDING TIME
UNDER LOCAL RULE 7.1.h.3(b) AND
FED. R. CIV. P. 6 (b); APPLICATION FOR
INCREASE OF TIME UNDER LOCAL
RULE 7.1.h.2**

11 COMMONWEALTH OF THE NORTHERN
MARIANA ISLANDS, NICOLE C. FORELLI,
12 WILLIAM C. BUSH, D. DOUGLAS COTTON,
L. DAVID SOSEBEE, ANDREW CLAYTON,
13 UNKNOWN AND UNNAMED PERSONS IN
THE CNMI OFFICE OF THE ATTORNEY
14 GENERAL, ALEXANDRO C. CASTRO, JOHN
A. MANGLONA, TIMOTHY H. BELLAS,
15 PAMELA BROWN, ROBERT BISOM, AND
JAY H. SORENSEN,

16 Defendants.
17

18 **CERTIFICATE PURSUANT TO LOCAL RULE 7.1.h.3(b)**

19 As undersigned counsel, Kristin D. St. Peter, certifies as follow:

20 a. The address and phone number of Plaintiff Bradshaw, who is without counsel, as listed on his
21 Amended Complaint is:

1 P.O. Box 473
2 1530 Trout Creek Road
3 Calder, Idaho 83808
4 Telephone: 208-245-1691

5 Defendants Commonwealth of the Northern Mariana Islands ("CNMI"), Nicole Forelli,
6 William C. Bush, D. Douglas Cotton, and Pamela Brown are represented by the Commonwealth of the
7 Northern Mariana Islands Attorney General's Office whose address and relevant numbers are:

8 Office of the Attorney General-Civil Division
9 2nd Floor, Hon. Juan A. Sablan Memorial Bldg.
10 Caller Box 10007
11 Saipan, MP 96950
12 Telephone: 670-664-2341
13 Facsimile: 670-664-2349

14 Defendant Jay Sorensen's address and relevant numbers are:

15 c/o Shanghai
16 Post Office Box 9022
17 Warren, MI 48090-9022
18 Telephone: (86) 21 5083-8542
19 Facsimile: (86) 21 5083-8542

20 Defendant Alexandro C. Castro is represented by the law firm of Civile and Tang, PLLC whose
21 address and relevant numbers are:

22 330 Herman Cortez Ave, Suite 200
Hagatna, Guam 96910
Telephone: 671-472-8868
Facsimile: 671-477-2511

Defendant Bisom is represented by Mark Hansen, Esq. whose address and relevant numbers are:

PMB 732, P.O. Box 10000
Saipan, MP 96950
Telephone: 670-230-8600

The Commonwealth of the Northern Mariana Islands Attorney General's Office will most

1 likely defend defendants David Sosebee and Andrew Clayton once they are properly served.

2 **FACTS SHOWING EXISTENCE AND NATURE OF THE CLAIMED EMERGENCY**
3 **OR REASON FOR EX PARTE APPLICATION**

4 Defendants CNMI, Nicole Forelli, William C. Bush, D. Douglas Cotton, and Pamela Brown
5 (hereafter collectively "Defendants") request that this Court extend and enlarge time to respond to
6 Plaintiff's Second Amended Complaint. Specifically, Defendants seek an enlargement up to and
7 including July 10, 2006 to file a dispositive motion or responsive pleading to the Plaintiff's Second
8 Amended Complaint.

9 This is the second request made by Defendants. The first extension gave Defendants until June
10 19, 2006 to file a dispositive motion or responsive pleading. This first request for extension of time
11 was made in order to resolve service issues with named, but un-served, Defendants Clayton and
12 Sosebee.

13 This second request is made because of the following facts:

- 14 1) This Court has yet to make a final ruling on Defendant Sorensen's motion to dismiss
15 on Rule 8 grounds. The Court's ruling on this motion impacts the form and content
16 of Defendant's dispositive motion; and
- 17 2) The undersigned counsel is preparing for a significant civil trial in the matter of *Tano*
18 *Group, Inc. v. Department of Public Works, et al.* CV 05-0100B currently scheduled
19 to be heard on June 26, 2006 in Commonwealth Superior Court. Because of a
20 critical shortage of attorneys within the Office of the Attorney General, the
21 undersigned is the only attorney with sufficient knowledge to respond to Plaintiff's
22 Second Amended Complaint.

1 Plaintiff Bradshaw's Second Amended Complaint is seventy-five pages long and contains
2 numerous causes of action under an exhaustive list of federal civil and criminal statutes, including,
3 among others, the Racketeer Influence Corrupt Organizations Act, the Immigration Reform and
4 Control Act and several Federal Civil Rights causes of action. Crafting an adequate response to all of
5 Plaintiff Bradshaw's allegations on behalf of the four Defendants is quite an undertaking.
6 Accordingly, Defendants need additional time to properly address Plaintiff's allegations and file a
7 responsive pleading or dispositive motion.

8
9 **PLAINTIFF BRADSHAW WAS NOTIFIED, BUT HAS YET TO BE SERVED WITH
THIS MOTION**

10 The undersigned Attorney General spoke with Plaintiff Bradshaw on June 10, 2006 at 11:30
11 a.m. local time. Mr. Bradshaw, appearing *pro se*, does not oppose this motion and agrees to enlarge
12 time up to and including July 10, 2006. Because Mr. Bradshaw resides in Idaho, Defendants were
13 unable to obtain a stipulation memorializing this agreement in a timely manner.

14
15 **APPLICATIONS TO INCREASE TIME PURSUANT TO LOCAL RULE 7.1.h.2**

16 Based upon the facts set forth herein, Defendants make this application to increase time and
17 state: a) one other extension of time was sought with respect to the Second Amended Complaint, b)
18 the reasons for this extension are set forth herein, and c) granting this extension would not effect any
19 scheduled dates.

1
2 WHEREFORE, based upon the foregoing, Defendants respectfully request that this Court grant
3 Defendants *Ex Parte* Motion Extending Time and enter an Order extending Defendants' deadline for
4 filing a dispositive motion or responsive pleading to the Plaintiff's Complaint until July 10, 2006

5 Respectfully submitted,

6 CNMI ATTORNEY GENERAL'S OFFICE
7 ON BEHALF OF DEFENDANTS CNMI, FORELLI,
8 BUSH, COTTON AND BROWN

9 By 

Kristin D. St. Peter -T-00039

Assistant Attorney General

Office of the Attorney General

2nd Floor, Juan A Sablan Memorial Bldg.

Caller Box 10007

Saipan, MP 96950

670-664-2341

CERTIFICATE OF SERVICE

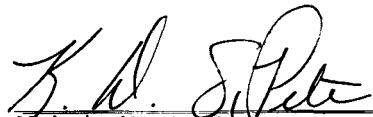
I HEREBY CERTIFY that a copy of the foregoing was served, via U.S. Mail, on
the 12 day of June 2006, upon the following:

Robert D. Bradshaw
Plaintiff, Pro Se
P.O. Box 473
1530 W. Trout Creek Road
Calder, ID 83808

Jay Sorensen
c/o Shanghai
Post Office Box 9022
Warren, MI 48090-9022
Telephone: (86) 21 5083-8542
Facsimile: (86) 21 5083-8542

Civille and Tang, PLLC
330 Herman Cortez Ave, Suite 200
Hagatna, Guam 96910
Telephone: 671-472-8868
Facsimile: 671-477-2511

Mark Hansen
PMB 732, P.O. Box 10000
Saipan, MP 96950
Telephone: 670-230-8600



Kristin D. St. Peter
Assistant Attorney General

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF THE NORTHERN MARIANA ISLANDS

ROBERT D. BRADSHAW,

Plaintiff,

vs.

COMMONWEALTH OF THE NORTHERN
MARIANA ISLANDS, NICOLE C. FORELLI,
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Defendants.

Case No. 05-0027

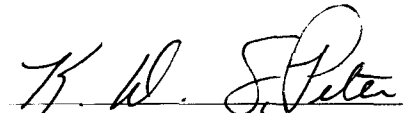
**DECLARATION OF KRISTIN D. ST. PETER
IN SUPPORT OF EX PARTE MOTION
EXTENDING TIME**

I, Kristin D. St. Peter, under penalty of perjury, declare as follow:

1. I am an individual currently residing on the Island of Saipan and employed as an Assistant Attorney General by the Commonwealth of the Northern Mariana Islands ("CNMI") Attorney General's Office.
2. I represent Defendants CNMI, Nicole Forelli, William Bush, Douglas Cotton and Pamela Brown in the above-entitled action.

- 1 3. Because of the voluminous nature of Plaintiff Bradshaw's complaint, Defendants
- 2 CNMI, Forelli, Bush, Cotton and Brown require additional time to file a dispositive
- 3 motion or responsive pleading to Plaintiff's Complaint.
- 4 4. Granting this extension request will not have any discernable effect on this
- 5 proceeding.
- 6 5. On June 10, 2006, I contacted Plaintiff Bradshaw telephonically and requested his
- 7 assent to extend Defendants' deadline to respond to Plaintiff's Second Amended
- 8 Complaint until July 10, 2006. Plaintiff Bradshaw agreed to this request.
- 9

10 I declare under penalty of perjury that the foregoing is true and correct to the best of my
11 knowledge. Signed on Saipan, CNMI this 10 day of June 2006.

12
13 
14 Kristin D. St. Peter